1 2	IN THE SUPREME COURT OF THE STATE OF NEVADA
3	LARENZO PINKNEY, Electronically Filed
4 5	Appellant, vs. Appellant,)) (Appellant,)) (Case NCIerR of Supreme Court
6 7	THE STATE OF NEVADA,
8 9	Respondent.
10 11	APPELLANT LARENZO PINKNEY'S MOTION FOR ENLARGMENT OF TIME TO FILE OPENING BRIEF
12	Comes Now Appellant LARENZO PINKNEY, by and through his attorney BETSY
13	ALLEN, Esq., and moves for an enlargement of time of FOURTEEN (14) days to file the
14	Opening Brief in this case. The grounds for this request are described in the attached
15 16	Declaration.
17	DATED this 4 th day of February, 2022.
18	LAW OFFICE OF BETSY ALLEN
19	
20 21	By: <u>/s/ Betsy Allen</u> BETSY ALLEN, ESQ.
21	Nevada Bar No. 6878 P.O. Box 46991
23	Las Vegas, Nevada 89114 (702) 386-9700
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27 28	
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	¹ Docket 83336 Document 2022-03878

1	DECLARATION OF BETSY ALLEN
2	1. I am an attorney licensed to practice law in the State of Nevada.
3	2. Counsel for Appellant had all of her work on an external hard drive, including
4	the work on this appeal.
5	3. Counsel went to open said file and the hard drive will not open any file. This
6	
7	was taken to a computer store and they were unable to open anything on this
8	external hardrive.
9	4. This hard drive will need to be sent to a data recovery expert, which will take
10 11	a number of weeks. Thus, counsel will need to re-do a good portion of this
11	appeal.
13	5. Counsel has previously requested one continuance in this matter for the
14	opening brief.
15	6. Counsel will try not to request another enlargement of time.
16	
17	I declare under penalty of perjury that the foregoing is true and correct.
18	EXECUTED on the 4 th day of February, 2022.
19	/s/ Betsy Allen BETSY ALLEN, ESQ
20	DEIST ALLEN, ESQ
21	CERTIFICATE OF SERVICE
22	I hereby certify and affirm that this document was filed electronically with the Nevada
23	Supreme Court on February 4, 2022. Electronic service of the foregoing document shall be
24	made in accordance with the Master Service List as follows:
25	AARON FORD, ESQ. Nevada Attorney Generala
26	ALEXANDER CHEN, ESQ.
27	Chief Deputy District Attorney
28	
	/s/ Betsy Allen BETSY ALLEN, ESQ
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